

EXHIBIT J

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

JANNIE PILGRIM, GIOVANNA HENSON,
JESAN SPENCER and BRENDA CURTIS,

Plaintiffs,

'07 CIV

-against-

6618

THE MCGRAW-HILL COMPANIES, INC.,
Defendant.

-----X

February 22, 2008

9:41 a.m.

Deposition of JANNIE PILGRIM, held
at the offices of Proskauer Rose LLP, 1585
Broadway, New York, New York, pursuant to
Notice, before Mildred Cassese, a Registered
Professional Reporter and Notary Public of
the State of New York.

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1 *J. Pilgrim*

2 Q. So are you -- my question is, is it
3 your contention that Ms. O'Connor discriminated
4 against you in any way?

5 MR. SOLOTOFF: Objection. She just
6 answered the question.

7 MR. RASIN: She didn't answer the
8 question.

9 MR. SOLOTOFF: It was the same
10 question you asked before.

11 MR. RASIN: Larry, I agree with you,
12 it was the same question, but I didn't get
13 an answer to that question.

14 MR. SOLOTOFF: You can answer the
15 question again.

16 A. Repeat the question.

17 Q. Is it your contention that
18 Ms. O'Connor discriminated against you?

19 A. I think making racial comments to me,
20 in front of me, I think that's discriminatory.

21 Q. And what racial comment did
22 Ms. O'Connor make?

23 A. I've heard her make several racial
24 comments. One is that black children do not get
25 kidnapped. No one kidnaps black children.

1 *J. Pilgrim*

2 Q. Anything else?

3 A. She made comments about what has Diana
4 Ross done for her people. I've never seen her do
5 anything for her people.

6 I've heard comments if someone was
7 black, they were articulate; if someone was
8 Caucasian, they were just smart. I think those --
9 things like that.

10 Q. Anything else?

11 A. At this time that I can recall? I
12 mean, I can't think of anything else at this time.

13 Q. Was there a time when you became a
14 staffing consultant?

15 A. Is that what the title was? Are we
16 referring to McGraw-Hill?

17 Q. I am.

18 A. If that was what the title was called.

19 Q. Do you remember when that was?

20 A. Was that around 2004?

21 Q. Well, are you guessing?

22 A. Yeah, I'm guessing.

23 Q. Did you get a promotion to staffing
24 consultant in October of 2003?

25 A. I mean, I don't know the dates, but I